

MICHELE BECKWITH
Acting United States Attorney
ANTONIO J. PATACA
JUSTIN GILIO
Assistant United States Attorneys
2500 Tulare Street, Suite 4401
Fresno, CA 93721
Telephone: (559) 497-4000
Facsimile: (559) 497-4099

Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARNOLD HUERTA,

Defendant.

CASE NO. 1:24-CR-00055-JLT-SKO

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

STIPULATION

1. By previous order, this matter was set for a change of plea hearing on February 3, 2025.
2. By this stipulation, defendant now moves to set a status conference on May 7, 2025, and to exclude time between February 3, 2025, and May 7, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The discovery associated with this case is voluminous and includes tens of thousands of pages, including investigative reports, photographs and videos, as well as hundreds of hours of recorded telephone conversations pursuant to wiretap orders, cellular phone extractions, and large amounts of cellular telephone precise location data and vehicle tracker data. All this discovery has been either produced directly to counsel, and/or made available for inspection and copying. The government has also produced multiple batches of supplemental

discovery and continues to produce additional discovery upon receipt.

b) The government continues to collect and process additional supplemental discovery in this case and plans to produce that discovery between today's date and the August status conference date.

c) Counsel for defendant is in the process of retaining new defense counsel and desires time to consult with his new attorney, conduct investigation, review the voluminous discovery, prepare for a possible trial, and explore a potential resolution of the case.

d) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

e) The government does not object to the continuance.

f) Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of February 3, 2025, to May 7, 2025, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(i), B(ii), and B(iv) because the case is so unusual or so complex, due to the number of defendants, the nature of the prosecution, or the existence of novel questions of fact or law, that it is unreasonable to expect adequate preparation for pretrial proceedings or for the trial itself within the time limits established by this section. This stipulation also results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

1 Dated: February 3, 2025

MICHELE BECKWITH
Acting United States Attorney

2
3 /s/ ANTONIO J. PATACA
4 ANTONIO J. PATACA
Assistant United States Attorney

5
6 Dated: February 3, 2025

/s/ MIKE MCKNEELY
7 MIKE MCKNEELY
Counsel for Defendant
8 ARNOLD HUERTA

9
10
11 **ORDER**

12 IT IS SO ORDERED.

13
14 Dated: 2/4/2025

15 *Sheila K. Oberto*
16 The Honorable Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE